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10 *Attorneys for Plaintiffs*

11 **IN THE UNITED STATES DISTRICT COURT**  
12  
**NORTHERN DISTRICT OF CALIFORNIA**

13 10 IN RE META PIXEL TAX FILING CASES

14 11 This document relates to:  
15 12  
16 13 All Actions

17 14 Master File No.: 5:22-cv-07557-PCP (VKD)

18 15 **DECLARATION OF MICHAEL LISKOW**  
19 16 **IN SUPPORT OF MOTION FOR**  
20 17 **VOLUNTARY DISMISSAL OF**  
21 18 **PLAINTIFF CRYSTAL CRAIG'S**  
22 19 **CLAIMS WITH PREJUDICE PURSUANT**  
23 20 **TO RULE 41(a)(2)**

24 21 The Honorable P. Casey Pitts

25 22 **REDACTED VERSION**

1 I, MICHAEL LISKOW, declare as follows:

2 1. I am an attorney admitted to practice in this Court.

3 2. I am a member of the law firm of George Feldman McDonald, PLLC, who  
4 along with the law firms Bursor & Fisher, P.A., Smith Krivoshey, P.C., The Hoda Law Firm,  
5 PLLC, Lockridge Grindal Nauen PLLP, Foster Yarborough PLLC, and Emerson Firm, PLLC,  
6 represent Plaintiffs in the above-captioned matter.

7 3. I have personal knowledge of the facts set forth herein and, if called as a  
8 witness, could and would testify competently to them.

9 4. On April 30, 2025, Plaintiff Crystal Craig (“Craig”) notified Plaintiffs’ counsel  
10 that she no longer wanted to, or could, continue in the case as a named plaintiff.

11 5. This is because, since joining this litigation, Craig has faced changed  
12 circumstances in her personal life. [REDACTED]

13 [REDACTED]  
14 [REDACTED] Her [REDACTED] have also made it much more  
15 difficult for Craig to meet her childcare and work obligations, leaving her with no time for  
16 anything else.

17 6. Prior to these changed circumstances, Craig met her obligations to the putative  
18 class by, *inter alia*, consulting with counsel, responding to discovery requests (including by  
19 serving responses to Meta’s Interrogatories) and generally keeping apprised of the status of the  
20 case.

21 7. Plaintiffs’ counsel tried to work with Craig to determine whether she could  
22 continue to participate in the litigation, but she made clear her view that she cannot and would  
23 not continue to participate further.

24 8. Plaintiffs’ counsel therefore prepared and sent Meta a draft stipulation of  
25 voluntary dismissal without prejudice for Craig on May 1, 2025.

26 9. Plaintiffs’ counsel met and conferred with Meta’s counsel on this issue on May  
27 7, 2025. During the meet and confer, Plaintiffs’ counsel asked Meta’s counsel what, if any,  
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1 unique information it believed it could only obtain from Craig, and what legal prejudice it would  
2 suffer from Craig's dismissal from the case. Meta's counsel said they would consider the issue  
3 in advance of the next meet and confer on Craig's dismissal.

4       10. The parties' counsel again met and conferred on this issue on May 15, 2025.  
5 Plaintiffs' counsel asked Meta's counsel what Meta's position would be if Craig agreed to  
6 dismiss her claims with prejudice. In response, Meta's counsel suggested that Meta would likely  
7 still seek Craig's deposition, regardless of whether Craig's withdrawal occurred with or without  
8 prejudice, but asked Plaintiffs' counsel to first confirm that Craig, in fact, would agree to  
9 dismissal with prejudice. Plaintiffs' counsel further asked Meta's counsel why it needed to  
10 depose Craig if she was willing to dismiss her claims, and Meta's counsel suggested that it was  
11 because they had spent time preparing for her deposition (despite the fact that, as of that date, no  
12 date for Craig's deposition had been noticed by Meta). Meta's counsel offered no other reason  
13 why Meta would suffer legal prejudice from Craig's dismissal without her sitting for a  
14 deposition.

15       11. The parties' counsel again met and conferred on June 4, 2025. During the meet  
16 and confer, Plaintiffs' counsel detailed Craig's changed circumstances and confirmed that she  
17 was willing to dismiss her claims with prejudice. Despite this, Meta's counsel confirmed that  
18 Meta would not agree to Craig's dismissal, even with prejudice, unless Craig agreed to be  
19 deposed.

20       12. On December 17, 2024, Meta served deposition notices on each Plaintiff  
21 without a date noticed for the depositions.

22       13. On May 5, 2025, Meta provided amended deposition notices for each Plaintiff  
23 except Craig that now included the noticed dates of the deposition. At the same time, in the  
24 cover letter attaching the deposition notices, Meta's counsel stated that they had "refrained from  
25 proposing a date/location for Crystal Craig at this time given our upcoming meet and confer  
26 about her desire to withdraw from the case."

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14. As of the filing of this declaration, Meta has not provided Craig with an amended deposition notice with a noticed date for her deposition.

15. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 5, 2025.

Michael Liskow